INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
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Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

March 16, 2004

TO: Interested Parties / Applicant

RE: H.A. Parts Products of Indiana Co. / MSM 133-17720-00019

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

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March 16, 2004

Mr. Bill Emanuel
H. A. Parts Products of Indiana Co.
2200 SR 240 East
Greencastle, IN 46135

Re: 133-17720
Minor Source Modification to
Part 70 Permit No.: 133-12660-00019

Dear Mr. Emanuel:

H. A. Parts Products of Indiana Co. was issued a Part 70 permit on March 19, 2002, for the operation of a stationary plastic automotive trim molding and surface coating source. An application to modify the source was received by the Office of Air Quality (OAQ) on July 17, 2003. The modification will result in the installation of one (1) robot paint line, identified as PT 540, for coating of garnish assembly trunks and spoiler assembly roofs (i.e. plastic parts). Pursuant to 326 IAC 2-7-10.5(d)(4)(B), the following emission unit is approved for construction at the source:

One (1) robot paint line, identified as PT 540, utilizing a High Volume Low Pressure (HVLP) spray application system coating a maximum of 17.1 garnish assembly trunks per hour and 14.6 spoiler assembly roofs per hour, equipped with a closed loop internal mix manifold system and a water-wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as 540-S, 540-SW and 540-NW. The paint line also includes one (1) convection oven (to cure the painted parts), utilizing two (2) 10 inch exhaust ducts, with a rain cap.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Seema Roy, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3419, or in Indiana at 1-800-451-6027.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SR / EVP

c: File - Putnam County
Putnam County Health Department
Northern Regional Office
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Ambil
Administrative and Development
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

H. A. Parts Products of Indiana Company
2200 SR 240 East
Greencastle, Indiana 46135

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.:133-17720-00019	Pages Modified: 2-4, 6, 6a, 7, 25-27, 27a, 27b, 28-33, 33a, 34-35, 35a, 35b
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 16, 2004

TABLE OF CONTENTS

(3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;

(4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;

(5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;

(6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;

(7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;

Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.

(g) one (1) paint line, identified as the Small Parts Line, consisting of the following:

(1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;

(2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and

(3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;

(h) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:

(1) one (1) Loading Clean Room;

(2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);

(3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);

(4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);

(5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);

(6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);

(7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);

(8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);

(9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);

(10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);

(11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and

(12) one (1) clean room for unloading of painted parts.

(i) One (1) robot paint line, identified as PT 540, utilizing a High Volume Low Pressure (HVLP) spray application system coating a maximum of 17.1 garnish assembly trunks per hour and 14.6 spoiler assembly roofs per hour, equipped with a closed loop internal mix manifold system and a water-wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as 540-S, 540-SW and 540-NW. The paint line also includes one (1) convection oven (to cure the painted parts), utilizing two (2) 10 inch exhaust ducts, with a rain cap.

(j) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

Co-Extrusion

(k) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

Flocking

(l) Three (3) Flockers for adhesive application, identified as FL 101, FL 112, and FL114. Both FL 101 and FL112 were constructed in 1989, FL 114 was constructed in 2000. Each utilizing an air atomization spray application system, each equipped with an infrared (IR) oven. The FL 101, FL112 and FL114 Flockers exhaust through one (1) stack, identified as F1, F4 and F6, respectively, and each IR Oven exhausts through one (1) stack, identified F2, F3, and F5, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:

(1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4].

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including five parts washers, identified as Tool & Die parts washer, two (2) Dept. 200 parts washers, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Old Paint Room

(a) one (1) paint spray booth, identified as Booth A (OPA), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPA-1 and OPA-2;

(b) one (1) paint spray booth, identified as Booth B (OPB), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through one (1) stack, identified as OPB-1;

(c) one (1) paint spray booth, identified as Booth D (OPD), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPD-1 and OPD-2;

(d) one (1) paint spray booth, identified as Booth E (OPE), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as OPE-1, OPE-2, and OPE-3;

(e) one (1) Mask washer, identified as Mask Washer #1, constructed in 1989, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as OPM-1;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP-133-5802-00019, issued October 7, 1996, the best available control technology (BACT) for the spray coating of plastic automobile trim in Booths A, B, D, and E shall be the use of a high volume low pressure (HVLP) spray gun with a closed-loop internal mix manifold system at all times during which this process is operated. The total amount of volatile organic compounds (VOC) delivered to the applicators in Booths A, B, D, and E shall not exceed 34.2 tons per twelve (12) consecutive month period. This usage limit is equivalent to 34.2 tons of VOC per twelve (12) consecutive month period.

D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from each of the Old Paint Room spray booths, identified as Booths A, B, D, and E shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from each surface coating facility shall be controlled by a closed loop internal mix / waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for Mask Washer #1, a cold cleaning operation constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.9 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs OPA-1, OPA-2, OPB-1, OPD-1, OPD-2, OPE-1, OPE-2, and OPE-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

During periods of inclement weather, the Permittee may perform the required visible emissions notations from the ground, observing and noting whether or not there are visible emissions exhausted from the stack(s) and if there is any overspray accumulation on the ground.

Upon determination that the weather has improved sufficiently to allow safe inspection of the rooftops, the Permittee shall inspect and note whether or not there is overspray accumulation on the rooftops.

If the Permittee performs the visible emissions notations during periods of inclement weather, the Permittee shall include in the required records, a statement that visible emissions were observed from the ground where the stack itself was not clearly visible, a description of the type of inclement weather which prevented viewing the stack from the rooftops, and the date the rooftops were observed.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.13 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.1.14 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

New Paint Room

(f) one (1) robot paint spray system, consisting of the following:
- (1) one (1) Primer coat spray booth (NPP), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPP-1 and NPP-2;
- (2) one (1) Primer coat flash/setting zone, exhausting through one (1) stack, identified as NPP-3;
- (3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;
- (4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;
- (5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;
- (6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;
- (7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;

Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.

(g) one (1) paint line, identified as the Small Parts Line, consisting of the following:
- (1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
- (2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and
- (3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;

(h) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:
- (1) one (1) Loading Clean Room;
- (2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);
- (3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);
- (4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);
- (5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);
- (6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);
- (7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);
- (8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);
- (9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);
- (10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);
- (11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and
- (12) one (1) clean room for unloading of painted parts.

(i) One (1) robot paint line, identified as PT 540, utilizing a High Volume Low Pressure (HVLP) spray application system coating a maximum of 17.1 garnish assembly trunks per hour and 14.6 spoiler assembly roofs per hour, equipped with a closed loop internal mix manifold system and a water-wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as 540-S, 540-SW and 540-NW. The paint line also includes one (1) convection oven (to cure the painted parts), utilizing two (2) 10 inch exhaust ducts, with a rain cap.

(k) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to CP-133-8608-00019, issued October 6, 1997, the best available control technology (BACT) for the two (2) paint lines (the robot paint spray system and the Small Parts Line) shall be:

(1) the use of a high volume low pressure (HVLP) spray application system with a closed loop internal mix manifold system;

(2) the use of a water wash system for overspray control, consisting of a water fall and water pan, at all times during which the robot paint spray system and the Small Parts Paint Line are in operation; and

(3) The total amount of VOC delivered to the applicators of the robot paint spray system and the Small Parts Line shall not exceed 63.6 tons per twelve (12) consecutive month period. This usage limit is equivalent to 63.6 tons of VOC per twelve (12) consecutive month period.

(b) Pursuant to Significant Source Modification No. 133-14228-00019, pending with the OAQ, the operation of the robot paint conveyor system without the use of add-on controls and with the following work practice and emission limitation will satisfy the BACT requirements:

(1) The coatings applied in each of the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall be applied using High Volume Low Pressure (HVLP) Spray Application guns.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) The total usage of VOC in the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall not exceed 97.85 tons per twelve (12) consecutive month period. This usage limit is equivalent to 97.85 tons of VOC per twelve (12) consecutive month period.

(c) Any change or modification which may increase potential to emit VOC from the robot paint line, identified as PT 540 to 25 tons per year or more shall require approval from IDEM, OAQ, prior to making the change.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total input of VOC to the robot paint spray system, the Small Parts line, and the robot paint conveyor system shall not exceed 138.07 tons per 12 consecutive month period, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.3 Volatile Organic Compounds and Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

(a) Pursuant to Agreed Order Case No. 2000-9022-A, the VOC and HAP input usage from Mask Washer # 7 and Mask Washer # 1 of Section D.1 shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) Any change or modification which increases emissions from the robot paint spray system, the Small Parts line, or the robot paint conveyor system of any single HAP or any combination of HAPs to greater than 10 and 25 tons per year, respectively, shall be subject to the requirements of 326 IAC 2-4.1-1 and must be approved by the Office of Air Quality before such change can occur.

D.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

(a) Pursuant to 40 CFR 52 Subpart P and CP 133-8608-00019, issued on October 6, 1997, the particulate matter (PM) from each of the robot paint spray system and the Small Parts Booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(b) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the primer coat, base coat, the clear coat spray booths of robot paint conveyor system, and the robot paint line, identified as PT 540 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from each surface coating facility shall be controlled by a closed loop internal mix / waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Mask Washer #7, which is a cold cleaning operation constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) for Mask Washer #7, the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met :

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.8 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.2.9 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

D.2.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the robot paint line, PT 540, robot paint spray system, the Small Parts Line, and the robot paint conveyor operation and their control devices.

Compliance Determination Requirements

D.2.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1, D.2.2 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.12 VOC Emissions

Compliance with Conditions D.2.1, D.2.2 and D.2.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.13 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (NPP-1, NPP-2, NPB-1, NPB-2, NPB-3, NPC-1, NPC-2, NPS-1, NPS-2, #2, #5, #6, and #9, 540-S, 540-SW, and 540-NW) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.14 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2 and the maximum HAP emissions established in Condition D.2.3.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.2.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.15 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.2.16 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.2.17 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.2.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.2.19 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Co-Extrusion

(l) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

Flocking

(m) Three (3) Flockers for adhesive application, identified as FL 101, FL 112, and FL114. Both FL 101 and FL112 were constructed in 1989, FL 114 was constructed in 2000. Each utilizing an air atomization spray application system, and each equipped with an infrared (IR) oven. The FL 101, FL112 and FL114 Flockers exhaust through one (1) stack, identified as F1, F4 and F6, respectively, and each IR Oven exhausts through one (1) stack, identified F2, F3, and F5, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) The total usage of VOC in the eight (8) co-extrusion lines shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, which is equivalent to less than twenty-five (25) tons of VOC emissions per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which increases emissions of VOC from the three (3) flockers to greater than 25 tons per year, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.

D.3.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from each of the three (3) flockers shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.3.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.3.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

Compliance Determination Requirements

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.3.6 VOC Emissions

Compliance with Condition D.3.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Monitoring

(a) To demonstrate compliance with condition D.3.2, weekly observations shall be made of the overspray from each of the three (3) flocker stacks (Stack IDs F1, F4 and F6 while one or more of the flockers are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the adhesive emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below for the eight (8) co-extrusion lines and the three (3) flockers. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.3.7, the Permittee shall maintain a log of weekly overspray observations and monthly inspections.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.3.10 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.3.11 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.3.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.3.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**H. A. Parts Products of Indiana Company**
Source Location:	**2200 SR 240 East, Greencastle, IN 46135**
County:	**Putnam**
SIC Code:	**3089**
Operation Permit No.:	**T133-12660-00019**
Operation Permit Issuance Date:	**March 19, 2002**
Minor Source Modification No.:	**133-17720-00019**
Significant Permit Modification No.:	**133-18041-00019**
Permit Reviewer:	**Seema Roy/EVP**

The Office of Air Quality (OAQ) has reviewed a modification application from H. A. Parts Products of Indiana Company relating to the construction and operation of the following emission unit and pollution control device at this existing stationary plastic automotive trim molding and surface coating source:

One (1) robot paint line, identified as PT 540, utilizing a High Volume Low Pressure (HVLP) spray application system coating a maximum of 17.1 garnish assembly trunks per hour and 14.6 spoiler assembly roofs per hour, equipped with a closed loop internal mix manifold system and a water-wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as 540-S, 540-SW and 540-NW. The paint line also includes one (1) convection oven (to cure the painted parts), utilizing two (2) 10 inch exhaust ducts, with a rain cap.

History

On July 17, 2003, H. A. Parts Products of Indiana Company submitted an application to the OAQ requesting to add a small robot paint line to their existing plant. H. A. Parts Products of Indiana Company was issued a Part 70 operating permit on March 19, 2002.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source was issued a Part 70 Operating Permit T133-12660-00019 on March 19, 2002. The source has since received the following:

(a) First Administrative Amendment No.: 133-15969, issued on June 18, 2002;

(b) First Significant Permit Modification No.: 133-16849, issued on April 10, 2003; and

(c) Second Administrative Amendment No.: 133-17435, issued on May 19, 2003.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
540-S	Exhaust from robot paint station-south	35	2	5,690	70
540-SW	Exhaust from robot paint station-south west	35	2	5,690	70
540-NW	Exhaust from robot paint station-north west	35	2	5,690	70

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and the Significant Permit Modification, be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 17, 2003. Additional information was received on August 25, 2003 and September 15, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 to 4).

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the potential to emit (PTE) before controls for the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	9.58
PM-10	9.58
SO_2	0.00
VOC	24.16
CO	0.00
NO_x	0.00

Note: VOC emissions indicate the worst case emissions from the small robot paint line and the emissions from the line cleaner which is equal to 2.47 tons per year.

HAP's	Potential To Emit (tons/year)
Formaldehyde	less than 10
Methanol	less than 10
Benzene	less than 10
MEK	less than 10
Naphthalene	less than 10
Cumene	less than 10
Ethyl Benzene	less than 10
Toluene	less than 10
2-Butoxy Ethanol	less than 10
Ethylene Glycol Monobutyl Ether	less than 10
Trimethyl Pentane	less than 10
Xylene	less than 10
2-Methoxy 1-Propanol Acetate	less than 10
TOTAL	less than 25

Justification for Modification

The Part 70 operating permit is being modified through both a Part 70 Minor Source Modification and Significant Permit Modification. These modifications are being performed based on the following justification:

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) is equal to or greater than 10 tons per year, but less than 25 tons per year. Therefore, this modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B).

(b) The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as Significant Permit Modification No. 133-18041-00019 in accordance with 326 IAC 2-7-12(d). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) is a precursor for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Putnam County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects calendar year 2001 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants and the Toxic Release Report maintained by the IDEM Office of Pollution Prevention and Technical Assistance.

Pollutant	Emissions (ton/yr)
PM	not reported
PM10	not reported
SO_2	not reported
VOC	93
CO	not reported
NO_x	not reported
single HAP (styrene)	not reported
total HAPs	not reported

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	4.28
PM-10	4.63
SO_2	0.04
VOC	<250
CO	5.15
NOx	6.13
Single HAP	>10
Total HAPs	>25

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Technical Support Document to the Part 70 Permit No. T133-12660-00019, issued on March 19, 2002.

Potential to Emit After Issuance for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (PTE) of Modification After Issuance (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
New Robot Paint Line PT 540	9.58	9.58	0.00	24.16	0.00	0.00	<10 (single) <25 (total)
PSD Threshold Level	250	250	250	250	250	250	N/A

	Potential to Emit (PTE) of Source After Issuance (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
PTE of Modification (New PT 540)	9.58	9.58	0.00	24.16	0.00	0.00	<10 (single) <25 (total)
Existing Old Paint Room (Booths A, B, D & E)	0.17	0.17	0.0	34.2*	0.0	0.0	11.58
Existing New Paint Room (Robot Paint Spray System & Small Parts Line)	0.09	0.09	0.0	40.22**	0.0	0.0	10.04
Existing New Paint Room (Flocking & Co-Extrusion)	3.35	3.35	0.0	39.79	0.0	0.0	34.98
Existing New Paint Room (Robot Paint Conveyor System)	0.55	0.55	0.0	97.85**	0.0	0.0	18.97
Existing Mask Washers (Old & New Paint Rooms)	0.0	0.0	0.0	4.74	0.0	0.0	4.74
Natural Gas Combustion	0.12	0.47	0.04	0.34	5.15	6.13	0.12
Total PTE for Source after Issuance	13.86	14.21	0.04	241.3	5.15	6.13	>10 (single) >25 (total)
PSD Threshold	250	250	250	250	250	250	N/A

* VOC emissions from Old Paint Room represent VOC emission limit pursuant to 326 IAC 8-1-6 as permitted in CP-133-5802-00019, issued October 7, 1996.

** Total VOC emissions from the Robot Paint Spray System, the Small Parts Line and the Robot Paint Conveyor System in the New Paint Room will be limited to 138.07 tons per year so that the requirements of 326 IAC 2-2 (PSD) do not apply. This limit includes a VOC emission limit of 97.85 tons per year for the Robot Paint Conveyor System pursuant to 326 IAC 8-1-6 as permitted in SSM 133-14228-00019, still pending.

(a) This modification to an existing minor stationary source is not major because the emission increase of the modification is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) This existing source will not change the PSD minor status after the modification because the emissions from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.

(b) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.4480, Subpart PPPP (Surface Coating of Plastic Parts and Products and (326 IAC 20-1-1)), effective the date the rule is published in the Federal Register. The provisions of this Subpart apply to a source that uses 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAPs) in the surface coating of plastic parts and products; and that is a major source, is located at a major source, or is part of a major source of emissions of HAPs, as defined at 40 CFR 63.2. This source is involved in the surface coating of plastics using more than 378 liters (100 gallons) per year of coatings that contain HAPs, and is a major source of HAPs. Therefore, the requirements of this rule apply to this source. The source is an existing affected source because it started coating plastic parts before December 4, 2002. The source has not chosen the method of compliance yet.

Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart PPPP on and after the date that is three years after the effective date of the rule. Since the compliance date of the rule has not passed and the Permittee has not chosen the method of compliance with Subpart PPPP, the detailed requirements of the NESHAP will not be included in this approval. Rather, this permit will state that the Permittee must comply with Subpart PPPP by the compliance date, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to compliance date. As an existing affected source, the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after the effective date of 40 CFR 63, Subpart PPPP. In addition, the Permittee must submit an application for a significant permit modification in order to establish enforceable limits or establish the compliance method. Such application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

Prior to the final promulgation of Subpart PPPP, the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) were applicable to this source. The Permittee submitted the requisite Part 1 MACT Application on June 18, 2002, after the May 15, 2002 reporting deadline. Notwithstanding the Part 1 application, the Permittee is required to comply with an applicable MACT standard that is promulgated prior to the Section 112(j) MACT deadline for a Part 2 MACT application [40 CFR 63.52(a)]. Since such deadline has not occurred, and Subpart PPPP has been signed as a final rule, the Section 112(j) requirements no longer apply to this source and are instead replaced by the requirements of 40 CFR 63, Subpart PPPP.

(c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 permit No.T133-12660-00019 on March 19, 2002, but the proposed PSEU as PT 540, has uncontrolled PTEs at less than 100 percent of the applicable major Part 70 thresholds. As such, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

This modification to an existing minor stationary source is not major because the source, which is not one of the 28 listed source categories, does not have the potential to emit of 250 tons per year or more of any criteria pollutant after enforceable controls and limitations. The source will continue to be a minor stationary source after the modification and no attainment regulated pollutant shall be emitted at a rate of 250 tons per year or more. Therefore, the PSD requirements will continue to not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAP, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to this modification because the source is subject to 40 CFR 63, Subpart PPPP.

40 CFR 52 Subpart P (Indiana SIP)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action. Therefore, the source shall comply as follows:

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the robot paint line, identified as PT 540, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Under the rule revision, and pursuant to 326 IAC 6-3-2(d), particulate from the robot paint line, PT 540, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

The source shall comply with this requirement by installing an internal mix manifold system and a waterwash for particulate control.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

The robot paint line, identified as PT 540, has a potential to emit of VOC that is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to this facility.

Testing Requirements

Testing is not required for the modification, since the surface coating material usage and related VOC and HAP emissions assume an emissions factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operations.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to robot paint line, identified as PT 540 are as follows:

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (540-S, 540-SW, and 540-NW) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the water wash system for the robot paint line must operate properly to ensure compliance with 40 CFR 52, Subpart P, 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Operations) and 326 IAC 2-7 (Part 70).

Changes to the Part 70 Permit Due to This Modification:

The changes listed below have been made to Part 70 Operating Permit T133-12660-00019. This includes revising Section A.2 and the equipment description box at Section D.2, and conditions in Section D.2 as necessary, to include the new robot paint line, PT 540. This includes D.1.2 and D.2.4, which have been revised to not only include the new surface coating facility, but also to revise the 326 IAC 6-3 requirements for the existing equipment based on the rule changes that became effective on June 12, 2002. New Conditions D.1.3 and D.2.5 are similarly added to the permit to again reflect the 326 IAC 6-3 rule requirements that became effective on June 12, 2002. Finally, Sections D.1 and D.2 have been revised to incorporate the requirements of NESHAP, 40 CFR 63, Subpart PPPP. All conditions are renumbered as necessary, without replication herein. The changes to the permit are as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

New Paint Room

(i) **One (1) robot paint line, identified as PT 540, utilizing a High Volume Low Pressure (HVLP) spray application system coating a maximum of 17.1 garnish assembly trunks per hour and 14.6 spoiler assembly roofs per hour, equipped with a closed loop internal mix manifold system and a water-wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as 540-S, 540-SW and 540-NW. The paint line also includes one (1) convection oven (to cure the painted parts), utilizing two (2) 10 inch exhaust ducts, with a rain cap.**

(~~i~~ **j**) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

Co-Extrusion

(~~j~~ **k**) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108, exhausting through E1, CX106, and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3.

Flocking

(~~k~~ **l**) two (2) flockers for adhesive application, identified as FL101 and FL 112, both constructed in 1989, each utilizing an air atomization spray application system, each equipped with one (1) infrared (IR) oven, with each flocker exhausting through one (1) stack, identified as F1 and F4, respectively, and each IR oven exhausting through one (1) stack, identified as F2 and F3, respectively.

D.1.2 Particulate Matter (PM) ~~[326 IAC 6-3-2]~~ **[40 CFR 52 Subpart P]**

Pursuant to 40 CFR 52 Subpart P, ~~Pursuant to 326 IAC 6-3-2,~~ the particulate matter (PM) from each of the Old Paint Room spray booths, identified as Booths A, B, D, and E shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from each surface coating facility shall be controlled by a closed loop internal mix / waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

~~D.1.7 Particulate Matter (PM)~~

~~In order to comply with Condition D.1.2, the closed loop internal mix system and water wash system for PM control shall be in operation and control emissions from Booths A, B, D, and E at all times when the four (4) paint booths (Booths A, B, D, and E) are in operation.~~

D.1.~~8~~**10** Monitoring

(a) ~~Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash system. To monitor the performance of the water wash system, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs OPA-1, OPA-2, OPB-1, OPD-1, OPD-2, OPE-1, OPE-2, and OPE-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit~~. **Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs OPA-1, OPA-2, OPB-1, OPD-1, OPD-2, OPE-1, OPE-2, and OPE-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.~~9~~**11** Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition~~s D.1.7 and~~ D.1.~~8~~ **10**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.13 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.1.14 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

New Paint Room

(i) **One (1) robot paint line, identified as PT 540, utilizing a High Volume Low Pressure (HVLP) spray application system coating a maximum of 17.1 garnish assembly trunks per hour and 14.6 spoiler assembly roofs per hour, equipped with a closed loop internal mix manifold system and a water-wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as 540-S, 540-SW and 540-NW. The paint line also includes one (1) convection oven (to cure the painted parts), utilizing two (2) 10 inch exhaust ducts, with a rain cap.**

(~~i~~**j**) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to CP-133-8608-00019, issued October 6, 1997, the best available control technology (BACT) for the two (2) paint lines (the robot paint spray system and the Small Parts Line) shall be:

(1) the use of a high volume low pressure (HVLP) spray application system with a closed loop internal mix manifold system;
(2) the use of a water wash system for overspray control, consisting of a water fall and water pan, at all times during which the robot paint spray system and the Small Parts Paint Line are in operation; and
(3) The total amount of VOC delivered to the applicators of the robot paint spray system and the Small Parts Line shall not exceed 63.6 tons per twelve (12) consecutive month period. This usage limit is equivalent to 63.6 tons of VOC per twelve (12) consecutive month period.

(b) Pursuant to Significant Source Modification No. 133-14228-00019, pending with the OAQ, the operation of the robot paint conveyor system without the use of add-on controls and with the following work practice and emission limitation will satisfy the BACT requirements:

(1) The coatings applied in each of the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall be applied using High Volume Low Pressure (HVLP) Spray Application guns.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) The total usage of VOC in the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall not exceed 97.85 tons per twelve (12) consecutive month period. This usage limit is equivalent to 97.85 tons of VOC per twelve (12) consecutive month period.

(c) Any change or modification which may increase potential to emit VOC from the robot paint line, identified as PT 540 to 25 tons per year or more shall require approval from IDEM, OAQ, prior to making the change.

D.2.4 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~**[40 CFR 52 Subpart P]**

(a) **Pursuant to 40 CFR 52 Subpart P and** ~~Pursuant to~~ CP 133-8608-00019, issued on October 6, 1997, ~~and pursuant to 326 IAC 6-3-2,~~ the particulate matter (PM) from each of the robot paint spray system and the Small Parts Booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(b) **Pursuant to 40 CFR 52 Subpart P,** ~~Pursuant to Significant Source Modification 133-14228-00019, pending with the OAQ, and pursuant to 326 IAC 6-3-2,~~ the particulate matter (PM) from the primer coat, base coat, ~~and~~ the clear coat spray booths of robot paint conveyor system**, and the robot paint line, identified as PT 540** shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from each surface coating facility shall be controlled by a closed loop internal mix / waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.2.8 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.2.9 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

D.2.~~7~~**10** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the **robot paint line, PT 540,** robot paint spray system, the Small Parts Line, and the robot paint conveyor operation and their control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.10 Particulate Matter (PM)~~

~~In order to comply with Condition D.2.4, each of the closed loop internal mix systems and water wash systems for PM control shall be in operation and control emissions from the Prime coat booth, the Base coat booth, and the Clear coat booth of the robot paint spray system, the Small Parts Booth, and the primer coat, base coat, and the clear coat spray booths of the robot paint conveyor system at all times when these paint booths are in operation.~~

D.2.~~11~~**13** Monitoring

(a) ~~Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash systems. To monitor the performance of the water wash systems, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs NPP-1, NPP-2, NPB-1, NPB-2, NPB-3, NPC-1, NPC-2, NPS-1, NPS-2, #2, #5, #6, and #9 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~ **Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (NPP-1, NPP-2, NPB-1, NPB-2, NPB-3, NPC-1, NPC-2, NPS-1, NPS-2, #2, #5, #6, and #9, 540-S, 540-SW, and 540-NW) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.~~12~~ **14**Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2 and the maximum HAP emissions established in Condition

D.2.3.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition~~s D.2.10 and~~ D.2.~~11~~**13**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.15 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.2.16 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least

2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.2.17 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.2.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.3.2 Particulate Matter (PM) ~~[326 IAC 6-3-2]~~**[40 CFR 52 Subpart P]**

Pursuant to 40 CFR 52 Subpart P, ~~Pursuant to 326 IAC 6-3-2,~~ the particulate matter (PM) from each of the three (3) flockers shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.3.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

D.3.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:

(1) General use coating subcategory;

(2) Automotive lamp coating subcategory;

(3) TPO coating subcategory;

(4) Assembled on-road vehicle coating subcategory; and

(5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

D.3.9 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. The Permittee must submit the existing affected source initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the affected facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of Compliance Status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.3.10 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

(a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.

(b) The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.

D.3.11 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

D.3.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Conclusion

The proposed modification to this existing stationary plastic automotive trim molding and surface coating source shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 133-17720-00019. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 133-18041-00019.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: H. A. Parts Products of Indiana Company
Address City IN Zip: 2200 SR 240 East, Greencastle, IN 46135
Part 70 Pemit: 133-12660-00019
Minor Source Modification No.: 133-17720-00019
Minor Permit Modification No.: 133-18041-00019
Reviewer: SR/EVP

Garnish Assembly Trunk

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Brilliant Silver	8.4	54.54%	0.0%	54.5%	0.0%	45.46%	0.02850	17.100	4.60	4.60	**2.24**	**53.78**	**9.81**	4.09	10.11	50%
Regal Blue Pearl	8.4	55.46%	0.0%	55.5%	0.0%	44.54%	0.02770	17.100	4.63	4.63	2.19	52.64	9.61	3.86	10.40	50%
Red Pearl	8.6	54.17%	0.0%	54.2%	0.0%	45.83%	0.02590	17.100	4.66	4.66	2.07	49.58	9.05	3.83	10.18	50%
Black Pearl	8.3	53.90%	0.0%	53.9%	0.0%	46.10%	0.02600	17.100	4.46	4.46	1.98	47.54	8.68	3.71	9.66	50%
Atlantic Blue	8.5	53.66%	0.0%	53.7%	0.0%	46.34%	0.02730	17.100	4.54	4.54	2.12	50.89	9.29	4.01	9.80	50%
Willow Green Opal	8.5	53.50%	0.0%	53.5%	0.0%	46.50%	0.02730	17.100	4.54	4.54	2.12	50.82	9.27	4.03	9.75	50%
Satin White Pearl-Midcoat	8.3	54.30%	0.0%	54.3%	0.0%	45.70%	0.02450	17.100	4.52	4.52	1.89	45.45	8.29	3.49	9.89	50%
Satin White Pearl-Basecoat	10.0	47.35%	0.0%	47.4%	0.0%	52.65%	0.02450	17.100	4.72	4.72	1.98	47.47	8.66	4.82	8.97	50%
Clear Coat	8.3	51.53%	0.0%	51.5%	0.0%	48.47%	0.02660	17.100	4.27	4.27	1.94	46.58	8.50	4.00	8.80	50%

Uncontroleed Potential Emissions **Add worst case coating to all solvents** **4.18** **100.36** **18.31** **8.09**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating (in bold) + Clear Coat

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VOC and Particulate
From Surface Coating Operations

Company Name: H. A. Parts Products of Indiana Company
Address City IN Zip: 2200 SR 240 East, Greencastle, IN 46135
Part 70 Pemit: 133-12660-00019
Minor Source Modification No.: 133-17720-00019
Minor Permit Modification No.: 133-18041-00019
Reviewer: SR/EVP

Spoiler Assembly Roof

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Brilliant Silver	8.4	54.54%	0.0%	54.5%	0.0%	45.62%	0.03980	14.600	4.60	4.60	**2.67**	**64.12**	**11.70**	**4.88**	10.08	50%
Regal Blue Pearl	8.4	55.46%	0.0%	55.5%	0.0%	44.73%	0.03880	14.600	4.63	4.63	2.62	62.96	11.49	4.61	10.35	50%
Red Pearl	8.6	54.17%	0.0%	54.2%	0.0%	45.01%	0.03630	14.600	4.66	4.66	2.47	59.32	10.83	4.58	10.36	50%
Black Pearl	8.3	53.90%	0.0%	53.9%	0.0%	46.50%	0.03640	14.600	4.46	4.46	2.37	56.83	10.37	4.44	9.58	50%
Atlantic Blue	8.5	53.66%	0.0%	53.7%	0.0%	46.58%	0.03830	14.600	4.54	4.54	2.54	60.95	11.12	4.80	9.75	50%
Willow Green Opal	8.5	53.50%	0.0%	53.5%	0.0%	46.73%	0.03820	14.600	4.54	4.54	2.53	60.71	11.08	4.82	9.71	50%
Satin White Pearl-Midcoat	8.3	54.30%	0.0%	54.3%	0.0%	43.53%	0.01890	14.600	4.52	4.52	1.25	29.93	5.46	2.30	10.38	50%
Satin White Pearl-Basecoat	10.0	47.35%	0.0%	47.4%	0.0%	52.50%	0.01530	14.600	4.72	4.72	1.05	25.31	4.62	2.57	8.99	50%
Clear Coat	8.3	51.53%	0.0%	51.5%	0.0%	57.56%	0.03660	14.600	4.27	4.27	2.28	54.72	9.99	4.70	7.41	50%
Uncontrolled Potential Emissions			**Add worst case coating to all solvents**								**4.95**	**118.84**	**21.69**	**9.58**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating (in bold) + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: H. A. Parts Products of Indiana Company
Address City IN Zip: 2200 SR 240 East, Greencastle, IN 46135
Part 70 Pemit: 133-12660-00019
Minor Source Modification No.: 133-17720-00019
Minor Permit Modification No.: 133-18041-00019
Reviewer: SR/EVP

Garnish Assembly Trunk

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % Methanol	Weight % Benzene	Weight % MEK	Weight % Naphthaline	Weight % Cumeme	Weight % Ethyl Benzene	Weight % Toluene	Weight % 2-Butoxy-ethanol	Weight % Ethylene Glycol Monobutyl Ether	Weight % Trimethyl pentane	Weight % Xylene	Weight % 2-Methoxy 1-Propanol Acetate	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Benzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	2-Butoxy-Ethanol Emissions (ton/yr)	Ethylene Glycol Monbutyl Ether Emissions (ton/yr)	Trimethyl pentane Emissions (ton/yr)	Xylene Emissions (ton/yr)	2-Methoxy 1-Propanol Acetate Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Brilliant Silver	8.4	0.02850	17.100	0.00%	0.00%	0.00%	0.31%	0.21%	0.05%	0.87%	2.37%	0.01%	0.00%	0.00%	4.03%	0.00%	0.00	0.00	0.00	0.06	0.04	0.01	0.16	0.43	0.00	0.00	0.00	0.72	0.00	1.41
Regal Blue Pearl	8.3	0.02780	17.100	0.00%	0.01%	0.00%	0.38%	0.17%	0.09%	0.75%	2.65%	0.01%	0.00%	0.00%	3.50%	0.00%	0.00	0.00	0.00	0.07	0.03	0.02	0.13	0.46	0.00	0.00	0.00	0.61	0.00	1.31
Red Pearl	8.6	0.02600	17.100	0.00%	0.01%	0.00%	0.31%	0.12%	0.10%	0.60%	5.25%	0.01%	0.00%	0.00%	2.82%	0.00%	0.00	0.00	0.00	0.05	0.02	0.02	0.10	0.88	0.00	0.00	0.00	0.47	0.00	1.54
Black Pearl	8.3	0.02600	17.100	0.00%	0.02%	0.00%	0.40%	0.26%	0.02%	2.15%	2.94%	0.01%	0.00%	0.00%	9.80%	0.01%	0.00	0.00	0.00	0.06	0.04	0.00	0.34	0.47	0.00	0.00	0.00	1.57	0.00	**2.51**
Atlantic Blue	8.5	0.02740	17.100	0.00%	0.00%	0.00%	0.42%	0.17%	0.03%	0.74%	3.34%	0.01%	0.00%	0.00%	3.41%	0.01%	0.00	0.00	0.00	0.07	0.03	0.01	0.13	0.58	0.00	0.00	0.00	0.59	0.00	1.41
Willow Green Opal	8.5	0.02730	17.100	0.00%	0.00%	0.00%	0.37%	0.19%	0.04%	1.43%	2.78%	0.01%	0.00%	0.00%	6.57%	0.01%	0.00	0.00	0.00	0.06	0.03	0.01	0.25	0.48	0.00	0.00	0.00	1.14	0.00	1.98
S W Pearl-Midcoat	8.2	0.02680	17.100	0.00%	0.00%	0.00%	0.38%	0.19%	0.14%	0.83%	3.01%	0.01%	0.00%	0.00%	3.93%	0.00%	0.00	0.00	0.00	0.06	0.03	0.02	0.14	0.50	0.00	0.00	0.00	0.65	0.00	1.40
S W Pearl-Basecoat	10.1	0.02190	17.100	0.00%	0.00%	0.00%	0.20%	0.12%	0.03%	0.60%	4.27%	0.01%	0.00%	0.00%	2.75%	0.02%	0.00	0.00	0.00	0.03	0.02	0.00	0.10	0.71	0.00	0.00	0.00	0.46	0.00	1.32
Clear Coat	8.4	0.02610	17.100	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%	0.04%	0.17%	0.00%	3.68%	0.00%	3.27%	0.00%	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.03	0.00	0.61	0.00	0.54	0.00	**1.19**
Total State Potential Emissions																	**0.00**	**0.01**	**0.00**	**0.47**	**0.24**	**0.09**	**1.35**	**4.53**	**0.01**	**0.61**	**0.00**	**6.75**	**0.01**	**3.70**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Coatings are mutually exclusive. Worst case coating (in bold) + clear coat used to determine potential to emit.

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Company Name: H. A. Parts Products of Indiana Company
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Reviewer: SR/EVP

Spoiler Assembly Roof

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % Methanol	Weight % Benzene	Weight % MEK	Weight % Naphthaline	Weight % Cumeme	Weight % Ethyl Benzene	Weight % Toluene	Weight % 2-Butoxy-ethanol	Weight % Ethylene Glycol Monobutyl Ether	Weight % Trimethyl pentane	Weight % Xylene	Weight % 2-Methoxy 1-Propanol Acetate	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Benzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	2-Butoxy-Ethanol Emissions (ton/yr)	Ethylene Glycol Monbutyl Ether Emissions (ton/yr)	Trimethyl pentane Emissions (ton/yr)	Xylene Emissions (ton/yr)	2-Methoxy 1-Propanol Acetate Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Brilliant Silver	8.4	0.03980	14.600	0.00%	0.00%	0.00%	0.31%	0.21%	0.05%	0.87%	2.37%	0.01%	0.00%	0.00%	4.03%	0.00%	0.00	0.00	0.00	0.07	0.04	0.01	0.19	0.51	0.00	0.00	0.00	0.86	0.00	1.68
Regal Blue Pearl	8.3	0.03880	14.600	0.00%	0.01%	0.00%	0.38%	0.17%	0.09%	0.75%	2.65%	0.01%	0.00%	0.00%	3.50%	0.00%	0.00	0.00	0.00	0.08	0.04	0.02	0.15	0.55	0.00	0.00	0.00	0.72	0.00	1.56
Red Pearl	8.6	0.03630	14.600	0.00%	0.01%	0.00%	0.31%	0.12%	0.10%	0.60%	5.25%	0.01%	0.00%	0.00%	2.82%	0.00%	0.00	0.00	0.00	0.06	0.02	0.02	0.12	1.05	0.00	0.00	0.00	0.56	0.00	1.84
Black Pearl	8.3	0.03640	14.600	0.00%	0.02%	0.00%	0.40%	0.26%	0.02%	2.15%	2.94%	0.01%	0.00%	0.00%	9.80%	0.01%	0.00	0.00	0.00	0.08	0.05	0.00	0.41	0.56	0.00	0.00	0.00	1.88	0.00	**3.00**
Atlantic Blue	8.5	0.03830	14.600	0.00%	0.00%	0.00%	0.42%	0.17%	0.03%	0.74%	3.34%	0.01%	0.00%	0.00%	3.41%	0.01%	0.00	0.00	0.00	0.09	0.04	0.01	0.15	0.69	0.00	0.00	0.00	0.71	0.00	1.68
Willow Green Opal	8.5	0.03820	14.600	0.00%	0.00%	0.00%	0.37%	0.19%	0.04%	1.43%	2.78%	0.01%	0.00%	0.00%	6.57%	0.01%	0.00	0.00	0.00	0.08	0.04	0.01	0.30	0.58	0.00	0.00	0.00	1.36	0.00	2.36
S W Pearl-Midcoat	8.2	0.01890	14.600	0.00%	0.00%	0.00%	0.38%	0.19%	0.14%	0.83%	3.01%	0.01%	0.00%	0.00%	3.93%	0.00%	0.00	0.00	0.00	0.04	0.02	0.01	0.08	0.30	0.00	0.00	0.00	0.39	0.00	0.84
S W Pearl-Basecoat	10.1	0.01530	14.600	0.00%	0.00%	0.00%	0.20%	0.12%	0.03%	0.60%	4.27%	0.01%	0.00%	0.00%	2.75%	0.02%	0.00	0.00	0.00	0.02	0.01	0.00	0.06	0.42	0.00	0.00	0.00	0.27	0.00	0.79
Clear Coat	8.4	0.03660	14.600	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%	0.04%	0.17%	0.00%	3.68%	0.00%	3.27%	0.00%	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.03	0.00	0.73	0.00	0.65	0.00	**1.42**
Total State Potential Emissions																	**0.00**	**0.01**	**0.00**	**0.50**	**0.26**	**0.09**	**1.47**	**4.69**	**0.01**	**0.73**	**0.00**	**7.41**	**0.01**	**4.42**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Coatings are mutually exclusive. Worst case coating (in bold) + clear coat used to determine potential to emit.